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Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Time Critical Removal Action
Monthly Report (February and March 2007)

INDUSTRIAL

Dear Sam:

Date:

April 16, 2007

Attached is the first monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Time Critical Removal Action. This progress report is submitted as per Section 19A of the February 2007 Administrative Settlement Agreement and Order on Consent for Removal Action (Docket No. V-W-07-C-863).

Contact:

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If you have any questions, please do not hesitate to contact me.

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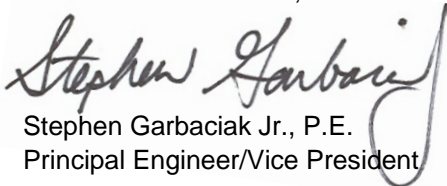
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Sincerely,

Our ref:

B0064530

ARCADIS of New York, Inc.


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Imagine the result

**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE
TIME CRITICAL REMOVAL ACTION**

REPORT #1, FEBRUARY AND MARCH 2007

**PREPARED BY ARCADIS BBL
APRIL 16, 2007**

ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP

SUBMITTED TO

**SAMUEL BORRIES, ON-SCENE COORDINATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site TCRA**

REPORT #1, FEBRUARY AND MARCH 2007

Significant Developments and Activities During the Period

- On February 20, the MDEQ transmitted the Substantive Requirements Document (SRD) for the Plainwell TCRA.
- On February 21, the USEPA executed the Administrative Settlement Agreement and Order on Consent for Removal Action (TCRA AOC) (Docket No. V-W-07-C-863). The TCRA AOC concerns the preparation and performance of the TCRA at the former Plainwell Impoundment.
- On February 26, the KRSG submitted the Contractor Qualifications Notification and the Project Coordinator Notification to the USEPA, as required by Paragraphs 11 and 12, respectively, of the TCRA AOC.
- On February 27, the USEPA issued a Press Release titled – *Media Advisory: Kalamazoo River Cleanup announcement in Plainwell, MI, 2 p.m., Wed. Feb 28.*
- On February 28, the USEPA issued a Press Release titled – *Agreements boost Kalamazoo River cleanup; \$21 million Plainwell project begins.*
- In February, the USEPA issued a Fact Sheet titled – *Agreements Will Boost Kalamazoo River Cleanup.*
- On March 6, the KRSG submitted a Subcontractor Qualification Notification to the USEPA, as required by Paragraph 11 of the TCRA AOC.
- On March 13, the KRSG submitted the results of the Indiana bat tree survey conducted as a part of the TCRA to the USEPA.
- On March 14, the KRSG transmitted an artist's rendering of the Plainwell site to the USEPA.
- On March 19, the KRSG participated with the USEPA in a planning meeting regarding the *Quality Assurance Project Plan* (QAPP) for the Site, as required by Paragraph 17d of the TCRA AOC.
- On March 21, the KRSG submitted a Subcontractor Qualification Notification to the USEPA, as required by Paragraph 11 of the TCRA AOC.
- On March 22, the KRSG submitted confirmation to the USEPA that all trees marked as a part of the Indiana bat habitat survey had been felled.
- On March 22, the KRSG submitted a summary of the March 19 QAPP meeting to the USEPA.
- On March 23, the KRSG and the USEPA participated in a conference call regarding tasks associated with the TCRA to be conducted at the 12th Street Landfill OU and the former Plainwell Paper Mill.

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site TCRA**

REPORT #1, FEBRUARY AND MARCH 2007

- On March 28, the KRSG submitted PCB influent sampling data from the Allied OU Ground Water Treatment Plant to the USEPA.
- By March 31, the KRSG had submitted property access request letters to fourteen property owners, as required by Paragraph 23 of the TCRA AOC (Table A).
- By March 31, the KRSG had obtained property access agreements from five property owners, as required by Paragraph 23 of the TCRA AOC. (Table A)

Data Collected and Field Activities Conducted During the Period

- During the week of March 5, the KRSG met with property owners to discuss access agreements in order to perform TCRA-related activities on private property.
- During the week of March 12, Dr. Kurta of Eastern Michigan University conducted a survey of potential Indiana bat habitat trees throughout the Plainwell TCRA work area.
- During the weeks of March 20 and March 27 geotechnical samples were collected from northern and southern waste disposal cells at the Allied OU. (Table B)
- During the weeks of March 20 and March 27, soil borings were emplaced along the northern and southern property boundaries of the Western Disposal Area at the Allied OU in order to determine the extent of residuals in the area. (Table C)
- By March 22, all potential Indiana bat habitat trees were felled.
- During the week of March 27, at the request of the MDNR, the KRSG performed oversight while three temporary monitoring wells were abandoned and five temporary monitoring wells were converted to permanent monitoring wells near the Plainwell Dam in order to monitor groundwater conditions during sediment removal activities.

Laboratory Data Received During the Period

- No laboratory data was received during this period.

Problems

- No problems were encountered this period.

Actions Taken to Correct Problems

- No activity.

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site TCRA**

REPORT #1, FEBRUARY AND MARCH 2007

Developments Anticipated During the Next Reporting Period

- On April 2 the KRSG is scheduled to provide ARCADIS BBL's *Quality Management Plan* to the USEPA, as required by paragraph 11 the TCRA AOC.
- On April 2, the KRSG is scheduled to meet with the City of Kalamazoo, the USEPA, and the MDEQ to discuss the disposal of TCRA-related soil and sediment at the Allied OU.
- By April 9, the KRSG is scheduled to submit the QAPP for the Site to the USEPA, as required by Paragraph 17d of the TCRA AOC.
- By April 9, the KRSG is scheduled to submit the *Health and Safety Plan* (HASP) for the Site to the USEPA.
- By April 9, the KRSG is scheduled to submit the *Field Sampling Plan* (FSP) for the Site to the USEPA.
- During the week of April 9, the KRSG is scheduled to begin site preparation (clearing and grubbing, installation of silt fences, construction of access roads) at the former Plainwell Impoundment.
- On April 12, the KRSG and the USEPA are scheduled to have a Pre-Construction Meeting at the former Plainwell Impoundment.
- On April 12, the KRSG is scheduled to meet with the MDNR to discuss prohibiting boat traffic to the Kalamazoo River work area.
- In April, the KRSG is scheduled to submit a *Traffic Control Plan* to the cities of Kalamazoo and Plainwell.
- In April, the KRSG will continue to submit Subcontractor Qualification Notifications to the USEPA, as required by Paragraph 11 of the TCRA AOC.
- The KRSG will continue to obtain property access agreements, as required by Paragraph 23 of the TCRA AOC.
- Based on USEPA's April 13, 2007 press release, the KRSG will halt all significant work on the river clean up, taking steps to stabilize current pre-construction activity. Work will resume on May 5, 2007.

**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment TCRA
February/March Monthly Report**

Table A — Summary of Property Access Agreements (as of March 31, 2007)

	Property Owner	Status
3/19/2007	A.C. Geenen Associates	no response
3/9/2007	Aggregate Industries	no response
3/9/2007	Allen Robinson	accepted
3/9/2007	Balkema Excavating	no response
3/9/2007	Brad Keeler	accepted
3/9/2007	City of Plainwell	no response
3/26/2006	Consumers Energy	no response
3/9/2007	Meijer, Inc.	no response
3/21/2007	Plainwell Group LLC	no response
3/16/2007	Robert Foster Trust	no response
3/9/2007	Robert Keeler Trust	accepted
3/9/2007	Rolfe Family Trust	accepted
3/16/2007	Shirley Foster	no response
3/9/2007	Steven Peterson	accepted

**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
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February 2007 Monthly Report**

**Table B — Summary of Geotechnical Samples Collected during March 2007 at the Allied-OU
and Submitted for Laboratory Analysis**

Date Sampled	BBL Sample ID	Boring ID	Comment
3/22/2007	GT-ST-1	SD-3	Shelby Tube Sample
3/22/2007	GT-ST-2	SD-1	Shelby Tube Sample
3/23/2007	GT-ST-3	SD-6	Shelby Tube Sample
3/23/2007	GT-ST-4	SD-7	Shelby Tube Sample
3/26/2007	GT-ST-5	SD-8	Shelby Tube Sample
3/27/2007	GT-ST-6	SD-2	Shelby Tube Sample

Notes:

1. ARCADIS BBL samples analyzed for Grain Size, Moisture Content, Atterberg Limits, Consolidated Undrained Shear Strength, Primary Consolidation and Permeability.

**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
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Table C — Summary of Residual Consolidation Sampling

Boring	Boring Depth (ft bgs)¹	Residuals Depth (ft bgs)²
ND-DPT-1	20	7-8
ND-DPT-2	20	no residuals
ND-DPT-3	20	no residuals
ND-DPT-4	20	no residuals
ND-DPT-5	20	no residuals
ND-DPR-6	20	no residuals
SD-DPT-1	20	1-11
SD-DPT-2	20	1-11
SD-DPT-3	20	1-11
SD-DPT-4	20	1-3
SD-DPT-5	20	1-3
SD-DPT-6	20	1-3

Notes:

- 1 bgs = below ground surface
- 2 Based on visual observations